



August 3, 2012

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 12-69

Dear Ms. Dortch:

On August 1, 2012, Eric Graham, Doug Hyslop and I met with Jim Schlichting, Tom Peters, Maria Kirby, Nicole McGinnis, and Susan Singer of the Wireless Telecommunications Bureau regarding the above-referenced proceeding. We reiterated the conclusion, supported by substantial quantitative data now in the record of this proceeding, that there is no engineering justification for the creation or continued use of Band 17 equipment and devices in Lower 700 MHz paired spectrum deployments.

During the course of our discussion, the attached materials were presented to Commission staff. These materials illustrate that the opponents of Lower 700 MHz interoperability have provided flawed and unreliable data to the Commission.

For example, the test that Qualcomm performed did not employ 700 MHz components or devices. Instead, Qualcomm has provided data related to a 1900 MHz power amplifier in a configuration that does not reflect the spacing that exists between Lower 700 MHz channels.

Additionally, AT&T has submitted to the Commission the results of lab testing that intentionally manipulated the placement of Lower 700 MHz B and C Block LTE signals. AT&T's commercial Lower 700 MHz systems place the LTE uplink channel from 704 to 714 MHz, when using 10 MHz channelization. But, without explanation, AT&T required its labs to conduct testing with the LTE signal in a different portion of the spectrum – at 706 to 716 MHz. The effect of this manipulation is to create an intermodulation product where it does not exist in any actual AT&T deployment. In other words, AT&T had to create a test scenario different from its real-world deployment in order to generate even a minimal intermodulation product. Clearly, this type of interference is not a legitimate concern in real-world deployments. Since the NPRM specifically requested data related to the potential impact to customers of Lower B and C Block licensees, AT&T's presentation of data resulting from a non-commercial 10 MHz channel configuration is inappropriate.

Finally, we noted that the opponents of Lower 700 MHz interoperability have failed to provide any test data related to the Lower E Block.

Because of these flaws and others illustrated in the attached presentation, AT&T's and Qualcomm's engineering data presented in this docket lacks credibility and fails to provide any reliable engineering justification for Band 17 and the continued competitive and public interest harms caused by the utilization of Band 17 for Lower 700 MHz B and C Block operations.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Moncrief". The signature is stylized with a large, looped "y" at the end.

Benjamin M. Moncrief
Director, Government Relations
C Spire Wireless

cc: Jim Schlichting (via e-mail)
Tom Peters (via e-mail)
Maria Kirby (via e-mail)
Nicole McGinnis (via e-mail)
Susan Singer (via e-mail)